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OFFICE OF
REHABILITATION**

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March 3, 2005

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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Federal Communications Commission
Office of Secretary

RE: CC Docket No. 98-67 and CG Docket No. 03-123

Dear Commissioners:

I am happy to have the opportunity to provide comment on the speed of answer requirement for video relay service (VRS), DA 05-339 released February 8, 2005. As the Director of the Division of Services to the Deaf and Hard of Hearing and a frequent personal user of VRS services, I will try my best to represent the perspective of the Deaf community in Utah (approximately 3,000 individuals). At our Community Center we have Sorenson VRS booths available for Deaf consumers to use. In addition, our Deaf staff have VRS units in their offices as it is their first choice for communication since American Sign Language is their natural language.

Though Deaf individuals do not enjoy having to wait for a VRS operator to become available at times, they value quality of interpreters and most understand the current shortage of qualified interpreters in our state. We encourage the Federal Communications Commission (FCC) to not enforce a speed of answer rule at this time. We believe it would compromise the quality of our communications. A speed of answer requirement should not take effect until we have enough qualified interpreters to meet the demand created by this emerging technology. Why impose speed of answer requirements when it would force VRS providers to hire less qualified interpreters? Deaf individuals highly value their messages being communicated accurately.

The Division of Services to the Deaf and Hard of Hearing has collaborated with the Deaf community and other interpreter providers to meet the challenge of generating additional qualified interpreters. Our collaboration lead to legislation being passed at the 2005 Utah Legislative session which just recently ended. House Bill 145, sponsored by Representative Brent Goodfellow, created new funding for training and certifying interpreters. This will greatly increase the number of qualified interpreters.

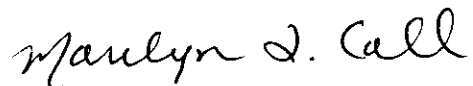
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As part of our plan to increase the pool of qualified interpreters, we are identifying former interpreters, educating them about the increased demand for interpreters as well as new employment opportunities, and assisting them to improve their skills so they can re-certify. The implementation of this new multifaceted training program is a challenge that will take time.

If other states are collaborating to find funding and ways to generate more qualified interpreters as we are in Utah, we feel strongly that within a few years VRS will be able to maintain quality and provide an improved speed of answer rate. It is our hope that the FCC will continue to monitor the situation but allow the time necessary to increase the pool of qualified interpreters for the needs of VRS, educational settings, and the various other interpreting needs in the greater community.

Sincerely,

A handwritten signature in cursive script that reads "Marilyn T. Call".

Marilyn T. Call
Director

MC:jh